

REMARKS

Claims 1-16 are pending in this application, and under consideration. Reconsideration is requested based on the following remarks.

Response to Arguments:

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The Office Action asserts in section 2, in the last full paragraph at page 2, that:

It is a well-settled rule that a reference must be considered not only for what it expressly teaches, but also for what it fairly suggests. See *In re Burckel*, 592 F.2d 1175, 201 USPQ 67 (CCPA 1979) and *In re Lamberti*, 545 F.2d 747, 192 USPQ 278, (CCPA 1976) as well as *In re Bode*, 550 F.2d 656, 193 USPQ 12, (CCPA 1977) which indicates such fair suggestions to unpreferred embodiments must be considered even if they are not illustrated.

While "a reference must be considered not only for what it expressly teaches, but also for what it fairly suggests," *In re Burckel*, the reference must still "fairly suggest" that its teachings should be modified as proposed in the Office Action. Furthermore, an unpreferred embodiment must still actually *be* an embodiment that is disclosed in the reference.

Where, as here, neither Kuroda nor Higashiura describe a management device that "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in, for example, claim 1, the references cannot "fairly suggest" that the teachings should be modified, since the management device is not an embodiment of either reference *at all*.

Furthermore, in *Bode*, although a drawing was not *required* in U.S. Patent No. 3,559,190 to Blitzer, Blitzer, still had to teach or suggest the claimed invention. Nothing in *In re Bode* indicates fair suggestions to unpreferred embodiments must be considered even if they are not *illustrated*, i.e. disclosed, contrary to the assertion in the Office Action.

The Office Action asserts further in section 2, also in the last full paragraph at page 2, that:

Additionally, it is an equally well-settled rule that what a reference can be said to fairly suggest relates to the concepts fairly contained therein, and is not limited by the specific structure chosen to illustrate such concepts. See *In re Bascom*, 230 F.2d 612, 614, 109 USPQ 98, 100 (CCPA 1956).

Even in *Bascom*, however, the overriding question to be determined is whether those concepts would have suggested to one skilled in the art the modification called for by the claims. See *In re Bascom*, 230 F.2d 612, 614, 109 USPQ 98, 100 (CCPA 1956). Where, as here, neither Kuroda nor Higashiura describe a management device that "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in, for example, claim 1, neither Kuroda nor Higashiura could have suggested to one skilled in the art the modification called for by the claims.

Obviousness, in any case, cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination. *ACS Hosp. Sys., Inc. v. Montefiore Hosp.*, 732 F.2d 1572, 1577 (Fed. Cir. 1984). A suggestion, teaching or motivation to combine the prior art references is an "essential evidentiary component of an obviousness holding." *C.R. Bard, Inc. v. MP3 Sys., Inc.*, 157 F.3d 1340, 1352 (Fed. Cir. 1998). "When a rejection depends on a combination of prior art references, there must be some teaching, suggestion, or motivation to combine the references." *In re Rouffet*, 47 USPQ2d 1453, 1456 (Fed. Cir. 1998). Furthermore, the suggestion must be clear and particular; broad conclusory statements about the teaching of multiple references, standing alone, are not "evidence." *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120 (Fed. Cir. 2000). "The board cannot rely on conclusory statements when dealing with particular combinations of prior art and specific claims, but must set forth the rationale on which it relies." *In re Lee*, 277 F.3d 1338, 1344, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002).

Finally, as provided in M.P.E.P. § 2143.03, all claim limitations must be taught or suggested.

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

Here, neither Kuroda nor Higashiura teach, disclose, or suggest a management device that "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in, for example, claim 1.

The Office Action asserts, in the second full paragraph at page 3, that:

Kuroda teaches the content can be stored in a storage, such as a magnetic disk

drive, and optical disk unit, magneto-optic -disk equipment, a memory card, a floppy disk, CD-ROM, an optical disc and a magneto-optic disc (sections 79-85 on pages 52-53). Kuroda discloses such storage is used as the document storage section storing documents (section 82 on page 52). This teaches documents can be stored in a storage, such as a portable medium, separately from document management information. Therefore, Kuroda teaches a content is removed from the management device via a portable medium.

This is submitted to be incorrect. Even though JP 2001-117820 to Kuroda et al. (hereinafter "Kuroda") does allow storage of the secure archive (SA) on external storage 115, as noted in the Office Action, the registration and revision processing and the content are maintained on the *same* secure archive at all times. Nothing in Kuroda teaches that the registration and revision processing and the content would *ever* be separated, let alone stored separately. In particular, as described in paragraph [0016], at page 33:

It unites with an electronic filing document and the registration information specified from applications, such as the attribute of P8: next the original, or copy, and the management information which SAs, such as attributes, such as a copy and original, and the date and time of creation, manage uniquely are treated. Thus, application is unifying an electronic filing document, management information, and registration information independently, and even if a document moves, it will become possible to refer to the attribute of the electronic original at a migration place.

Thus, in Kuroda, in contrast to the claimed invention, the registration and revision processing and the content are maintained on the same secure archive at all times. If the external storage 115 of Kuroda is used, it contains the program and data, and the entire secure archive is stored to external storage document storage section 36. In particular, as described in paragraph [0082], at page 52:

External storage 115 is a magnetic disk drive, an optical disk unit, magneto-optic-disk (magneto-optical disk) equipment, etc. The information processor saves an above-mentioned program and data at this external storage 115, and can load and use them for memory 112 if needed. Moreover, external storage 115 is used also as the document storage section 36 of drawing 4, and the physical ID creation section 37.

Thus, in Kuroda, in contrast to the claimed invention, if the content is stored on external storage 115, the registration and revision processing information is stored there as well.

Finally, even if Kuroda *did* teach that "content was removed from the *management device* via the portable medium," as asserted in the Office Action in the last line of the second full paragraph at page 3, with emphasis added, that still would not amount to the registration and revision processing and the content being stored separately. Rather, it would only mean that

both the content and the registration and revision processing information were stored together on a portable medium such as external storage 115.

The Office Action asserts in the fifth paragraph at page 4, that:

Thus, Higashiura teaches storing the content in a portable medium separately from the content management information.

This is submitted to be incorrect. Although U.S. Patent Publication No. 2002/0002561 to Higashiura et al. (hereinafter "Higashiura") discusses sweeping a part of a file to an external medium before the RAID device becomes full, as noted in the Office Action at the bottom of page 3, that still does not amount to storing the content in a portable medium separately from the content management information. Higashiura, rather, merely describes storing part of a file on an external medium.

Higashiura, in fact, is about storing histories of revisions separately from documents to determine which electronic file is an original document. In particular, as described in paragraph [0037]:

According to the present invention, when an electronic file is processed, for example, when an electronic file is swept and a backup electronic file is made, these histories are stored, and it can be clearly determined which electronic file is an original document. Therefore, only one original document is stored, and can be discriminated from a file stored in a storage unit or a storage medium different from that storing the original document, thereby successfully managing the electronic file without damaging the originality of the original document.

Thus, Higashiura has no need for storing "a processing history of said registration processing or said revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1, since Higashiura is storing histories of revisions separately from documents to *determine* which electronic file is an original document.

Similarly, although Higashiura describes adding a disk device, or sweeping an older file onto a tape at paragraph [0014], that still does not amount to storing the content in a portable medium separately from the content management information. Rather, in the case Higashiura describes here, there is no content management information mentioned at all.

In addition, although Higashiura describes document D, the current content information, being left in the first storage medium at paragraph [0081], as shown in Fig. 6A, and then sharing the first storage medium with document E, as shown in Fig. 6B, along with information about the previously swept documents A through C, that still does not amount to storing the content in a portable medium separately from the content management information. Rather, at most, that

amounts to storing the content *together* with content management information.

Furthermore, even though, as noted with bold type in the Office Action, in the third full paragraph at page 4, another storage medium also stores a sweep history file in Higashiura, that still does not amount to storing the *content* in a portable medium separately from the content management information. Even in this case, rather, Document E, which is the content information in Higashiura at this point, still resides on the first storage medium.

Finally, as noted in bold type in the fourth full paragraph at page 4 of the Office Action, documents A, B, and C, the content *management* information in Higashiura, are swept into another storage medium, not the content itself, as described at paragraph [0084]. As also noted in bold type in the Office Action, the sweep history file, which is also content management information, is stored on another medium.

Thus, in Higashiura, the management device *itself* stores the content while the *external* storage unit stores a history of the sweeping process or a history of a backup process, and Higashiura does not teach storing the content in a portable medium separately from the content management information, contrary to the assertion in the Office Action in the fifth full paragraph at page 4. Nor does Higashiura teach removing a portable medium containing the content from the management device, also contrary to the assertion in the Office Action in the fifth full paragraph at page 4. Further reconsideration is thus requested.

Claim Rejections - 35 U.S.C. § 103:

Claims 1, 2, 3, 5, 6, 7, 8-12, 14, 15, and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Patent Abstracts of Japan Publication No. 2001-117820 to Kuroda et al. (hereinafter "Kuroda") in view of U.S. Publication No. 2002/0002561 to Higashiura et al. (hereinafter "Higashiura").

In the claimed invention, in several embodiments, a processing history of electronic content is stored on a management device while the content itself is stored on a removable (external) storage device. This allows the space available to store the electronic content to be expanded easily, as the volume of the electronic content increases, by simply replacing the removable storage device with a larger one. To this end, the fifth clause of claim 1 recites:

Wherein the management device, on command from an external device, registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit.

Neither Kuroda nor Higashiura teach, disclose, or suggest a management device that "registers

and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

In Kuroda, rather, as shown in Fig. 1, the electronic original management equipment itself is equipped with the registration means 1, the grant means 2, a management tool 3, and the issue means 4, so nothing related to the processing history or the content of the original equipment needs to be on another device. The electronic original management equipment of Kuroda thus manages and stores the processing history and the content inside. In particular, as described at paragraph [0006]:

The electronic original management equipment of drawing 1 is equipped with the registration means 1, the grant means 2, a management tool 3, and the issue means 4.

Since, in Kuroda, the electronic original management equipment manages and stores the processing history and the content inside, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, the electronic original management equipment manages both the original information and the electronic intelligence. In particular, as described at paragraph [0007]:

In the 1st aspect of affairs of this invention, the registration means 1 registers electronic intelligence as original information, and the grant means 2 gives the logical identifier information which identifies electronic intelligence uniquely logically, and the whereabouts identification information showing the physical whereabouts of electronic intelligence to the electronic intelligence. A management tool 3 manages original information using the combination identification information based on the combination of logical identifier information and whereabouts identification information, and the issue means 4 publishes registration bond information that it is used for access to original information, including the combination identification information.

Since, in Kuroda, the original information and the electronic intelligence are both managed by the electronic original management equipment, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, electronic intelligence is treated as original information only after

it is registered. In particular, as described at paragraph [0010]:

Since according to such electronic original management equipment electronic intelligence is treated as original information only after it is registered, it can clarify that the copy of the electronic intelligence generated by the registrant side is not original information. Moreover, since a registrant and other users access original information using the published registration bond information, they can identify the registered original information uniquely. Therefore, the safety of original management improves.

Since, in Kuroda, electronic intelligence is treated as original information only after it is registered, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, a management tool 3 generates a series of corresponding instances of original information according to a change. In particular, as described at paragraph [0011]:

Moreover, in the 2nd aspect of affairs of this invention, a management tool 3 generates a series of corresponding instances of original information according to a change [time series / electronic intelligence], and manages the instance of a series of as one original sequence. The grant means 2 gives original sequence identification information to an original sequence, and the issue means 4 publishes registration bond information that it is used for access to one instance in a series of instances, including the original sequence identification information.

Since, in Kuroda, the management tool 3 generates a series of corresponding instances of original information according to a change, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, an instance of original information is generated when the registered electronic intelligence changes with updating etc., and the management tool 3 manages a series of instances using the original sequence identification information given by the grant means 2. In particular, as described at paragraph [0012]:

The instance of original information is generated when the registered electronic intelligence changes with updating etc., and a management tool 3 manages a series of instances using the original sequence identification information given by the grant means 2. And the issue means 4 generates the registration bond information containing the original sequence identification information, and publishes it to a registrant etc.

Since, in Kuroda, the electronic original management equipment both generates instances of original information and manages the series of instances of original information, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, the electronic filing document registered into electronic original management equipment is altogether treated as the electronic original irrespective of the attribute of the "original", "copy", etc. depending on application, and a registration bond is published to the electronic original. In particular, as described at paragraph [0015]:

In this invention, electronic original management equipment is formed apart from the computing environment which provides a user with service. Moreover, the electronic filing document registered into electronic original management equipment is altogether treated as the electronic original irrespective of the attribute of the "original", "copy", etc. depending on application, and a registration bond is published to the electronic original. Treating all as the electronic original corresponds to the condition of having outputted the electronic filing document to paper, and the user of the electronic original accesses the electronic original henceforth using the published registration bond. For example, the following is registered as the electronic original.

Since, in Kuroda, the electronic filing document registered into electronic original management equipment is altogether treated as the electronic original irrespective of the attribute of the "original", "copy", etc. depending on application, and a registration bond is published to the electronic original, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, the electronic filing document processed and drawn up by computer by the side of a user serves as the electronic original only after it is registered into SA. In particular, as described at paragraph [0016]:

The electronic filing document processed and drawn up by computer by the side of a user serves as the electronic original only after it is registered into SA. Thus, even if the copy of an electronic filing document is performed by the user side and the completely same electronic filing document is drawn up by treating as the original only after registering an electronic filing document into SA, they can clarify that the electronic filing document is not the original but SA is the original.

Since, in Kuroda, the electronic filing document processed and drawn up by computer by the

side of a user serves as the electronic original only after it is registered into SA, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, the electronic original 14 is only *exchanged* using the secure medium 16, not stored. In particular, as described at paragraph [0018]:

The service client 12 and SA11 are connected to the communication network, and the service client 12 accesses the electronic original 14 in SA11 using the document record 15 published from SA11 at the time of electronic original registration. Moreover, in the case of network connection, in the exchange between SAs11, the electronic original 14 is exchanged like the service client 12 and the communication link between SAs11 using the document record 15. In the case of off-line, the electronic original 14 is exchanged using the secure medium 16.

Since, in Kuroda, the electronic original 14 is only exchanged using the secure medium 16, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, the electronic original 14 is only exchanged using the secure medium 16, not stored. In particular, as described at paragraph [0019]:

The local environment 13 of a service client side is a system which guarantees safeties (original nature), such as the only nature of the electronic original, in its one post, office, etc. in a firm, and contains local SA21 and a user terminal 22. Original nature is guaranteed only within the local environment 13, and the electronic original managed in local SA21 is not linked with the electronic original in other SAs11. Between local SA21 and external SA11, the information on the electronic original can be exchanged through a communication network or the secure medium 16.

Since, in Kuroda, the electronic original 14 is only exchanged using the secure medium 16, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1. Furthermore, in Kuroda, SA11 contains the original sequence Management Department 34 as well as the document storage section 36.

In particular, as described in paragraph [0020], at page 34:

Drawing 4 is the block diagram of SA11 of drawing 3. SA11 of drawing 4 is equipped with a network interface 31, the demand interpretation section 32, the answerback creation section 33, the original sequence Management Department 34, the registration bond creation section 35, the document storage section 36, physical ID creation section 37, the cipher-processing section 38, the key attaching part 39, the discernment ID creation section 40, the time-of-day generation section 41, the equipment ID attaching part 42, and the incremental counter 43.

Thus, in Kuroda, in contrast to the claimed invention, the registration and revision processing and the content are maintained on the same secure archive at all times.

Furthermore, in Kuroda, the SA holds the instance of the original at the time, whenever a condition changes, and it manages a series of instances as an original sequence. In particular, as described in paragraph [0034], at page 37:

Next, management of an original sequence is explained. As for the original registered into SA, the condition changes with actuation of updating, migration, deletion, etc. SA holds the instance of the original at the time, whenever a condition changes, and it manages a series of instances as an original sequence. And the original sequence ID is given to the original sequence, and it identifies uniquely. Thereby, if it sees from a service client, it will become possible to specify the sequence as the one original and to take it out.

Thus, in Kuroda, in contrast to the claimed invention, the registration and revision processing and the content are maintained on the same secure archive at all times.

Furthermore, in Kuroda, whenever a change of state happens, an instance like the electronic filing documents is held in the secure archive. In particular, as described in paragraph [0036], at page 37:

Then, if correction etc. is made on an electronic filing document D1, the condition of the original changes and re-registration is performed, SA will generate the instance of the electronic filing document D 1-2 which makes SID1 the original sequence ID, and will hold it. Henceforth, whenever a change of state happens, an instance like the electronic filing documents [D / D, D / 1-4 /, and / 1-5] 1-3 is held, and a series of instances are identified by SID1.

Thus, in Kuroda, in contrast to the claimed invention, the registration and revision processing and the content are maintained on the same secure archive at all times.

Furthermore, in Kuroda, SA holds the instance of the original and manages a series of instances as an original sequence, not stored. In particular, as described at paragraph [0034]:

Next, management of an original sequence is explained. As for the original registered into SA, the condition changes with actuation of updating, migration, deletion, etc. SA holds the instance of the original at the time, whenever a condition changes, and it manages a series of instances as an original sequence.

And the original sequence ID is given to the original sequence, and it identifies uniquely. Thereby, if it sees from a service client, it will become possible to specify the sequence as the one original and to take it out.

Since, in Kuroda, SA holds the instance of the original and manages a series of instances as an original sequence, not stored, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, SA will give SID1 to an electronic filing document D 1-1 as an original sequence ID, and will manage it as an original sequence S1. In particular, as described at paragraph [0035]:

Drawing 7 shows signs that an original sequence is uniquely identified according to the original sequence ID. If an electronic filing document D1 is registered into SA as an electronic filing document D 1-1, SA will give SID1 to an electronic filing document D 1-1 as an original sequence ID, and will manage it as an original sequence S1.

Since, in Kuroda, SA will give SID1 to an electronic filing document D 1-1 as an original sequence ID, and will manage it as an original sequence S1, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, if correction etc. is made on an electronic filing document D1, the condition of the original changes and re-registration is performed, SA will generate the instance of the electronic filing document D 1-2 which makes SID1 the original sequence ID, and will hold it. In particular, as described at paragraph [0036]:

Then, if correction etc. is made on an electronic filing document D1, the condition of the original changes and re-registration is performed, SA will generate the instance of the electronic filing document D 1-2 which makes SID1 the original sequence ID, and will hold it. Henceforth, whenever a change of state happens, an instance like the electronic filing documents [D / D, D / 1-4 /, and / 1-5] 1-3 is held, and a series of instances are identified by SID1.

Since, in Kuroda, if correction etc. is made on an electronic filing document D1, the condition of the original changes and re-registration is performed, SA will generate the instance of the electronic filing document D 1-2 which makes SID1 the original sequence ID, and will hold it, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision

processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, a series of instances of an electronic filing document are managed as an original sequence S2. In particular, as described at paragraph [0037]:

Moreover, SID2 is newly given to the electronic filing document D2 registered apart from the electronic filing document D1 as an original sequence ID. And a series of instances [D / D, D / 2-2 /, and / 2-3] 2-1 of an electronic filing document D2, D 2-4, and D2-5 grade are identified by SID2, and are managed as an original sequence S2. even when the contents of the electronic filing document D2 are completely the same as the contents of the electronic filing document D1 at this time, SA manages each as another electronic original.

Since, in Kuroda, a series of instances of an electronic filing document are managed as an original sequence S2, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, SA gives a time stamp to each [of an original sequence] instance at the time. In particular, as described at paragraph [0038]:

If such an original sequence ID is used, it is possible to identify a series of instances generated by the change of state as the one original. However, to perform audit of a court document etc., it is necessary to specify and take out the instance at the time of the arbitration in a certain original sequence. Therefore, SA gives a time stamp to each [of an original sequence] instance at the time.

Since, in Kuroda, SA gives a time stamp to each [of an original sequence] instance at the time, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1.

Furthermore, in Kuroda, if an electronic filing document D1 is registered as an electronic filing document D 1-1, the time stamp T1 at the registration time is given, and whenever it is a change of state henceforth, a time stamp T2, T3, T four, and T5 grade will be given to each instance. In particular, as described at paragraph [0039]:

Drawing 8 shows signs that the instance which changes to time series is managed with the time stamp in a certain original sequence. If an electronic filing document D1 is registered as an electronic filing document D 1-1, the time stamp T1 at the registration time is given, and whenever it is a change of state henceforth, a time stamp T2, T3, T four, and T5 grade will be given to each

instance. A user becomes possible [specifying and taking out the instance at the time of the arbitration of the electronic original] by specifying the original sequence ID and a time stamp.

Since, in Kuroda, if an electronic filing document D1 is registered as an electronic filing document D 1-1, the time stamp T1 at the registration time is given, and whenever it is a change of state henceforth, a time stamp T2, T3, T four, and T5 grade will be given to each instance, nothing in the electronic original management equipment "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as recited in claim 1. Finally, in Kuroda, the external storage 115, if used, contains the program and data and entire secure archive is stored to external storage document storage section 36. In particular, as described in paragraph [0082], at page 52:

External storage 115 is a magnetic disk drive, an optical disk unit, magneto-optic-disk (magneto-optical disk) equipment, etc. The information processor saves an above-mentioned program and data at this external storage 115, and can load and use them for memory 112 if needed. Moreover, external storage 115 is used also as the document storage section 36 of drawing 4 , and the physical ID creation section 37.

Thus, in Kuroda, in contrast to the claimed invention, the registration and revision processing and the content are maintained on the same secure archive at all times. This also means that Kuroda has no need for storing "a processing history of said registration processing or said revision processing and the media ID for the content in relation to each other into said storage unit," as also recited in claim 1, since the registration and revision processing and the content of Kuroda are maintained *together* on the same secure archive at all times.

Similarly, in Higashiura, the management device *itself* stores the content while the *external* storage unit stores a history of the sweeping process or a history of a backup process. In particular, as described in the Abstract:

When a sweeping process and a backup process are performed on an electronic library file in an electronic library, a file storing a history of the sweeping process or a history of a backup process is generated, and the sweeping and the backup processes are managed. Thus, a user can easily manage as to which medium an original document has been swept to or where a backup copy of the original document is. If the uniqueness of the original document shown in a sweep history and a backup history can be secured, the problem that there can be a plurality of original documents on the storage media of a plurality of electronic libraries can be avoided.

Since, in Higashiura, the management device stores the content while the external storage unit

stores a history of the sweeping process or a history of a backup process, nothing in the management device “registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit,” as recited in claim 1. Thus, since neither Kuroda nor Higashiura teach, disclose, or suggest a management device that “registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit,” as recited in claim 1, their combination cannot either. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 2, 3, 5, 6, and 7 depend from claim 1 and add additional distinguishing elements. Claims 2, 3, 5, 6, and 7 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2, 3, 5, 6, and 7 is earnestly solicited.

Claims 8-12 and 14:

The last clause of claim 8 recites:

Wherein the management device, on a request input of a registration and a revision on the content, registers and revises the content on the second storage unit and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said first storage unit.

Neither Kuroda nor Higashiura teach, disclose, or suggest a management device that “registers and revises the content on the second storage unit and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said first storage unit,” as discussed above with respect to claim 1. Claim 8 is thus also submitted to be allowable, for at least those reasons discussed above with respect to claim 1. Withdrawal of the rejection of claim 8 is earnestly solicited.

Claims 9-12 and 14 depend from claim 8 and add additional distinguishing elements. Claims 9-12 and 14 are thus also submitted to be allowable. Withdrawal of the rejection of claims 9-12 and 14 is earnestly solicited.

Claim 15:

The last clause of claim 15 recites:

A management device for executing registration and revision processing of the content on an external storage unit that has a media ID that is peculiar to a storage unit and stores a processing history of said registration processing or a

revision processing and the media ID for the content in relation to each other into said internal storage unit, on a request input of a registration and a revision on the content.

Neither Kuroda nor Higashiura teach, disclose, or suggest a management device for "registration and revision processing of the content on an external storage unit that has a media ID that is peculiar to a storage unit and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said internal storage unit, on a request input of a registration and a revision on the content," as discussed above with respect to claim 1. Claim 15 is thus also submitted to be allowable, for at least those reasons discussed above with respect to claim 1. Withdrawal of the rejection of claim 15 is earnestly solicited.

Claim 16:

The last clause of claim 16 recites:

executing registration and revision processing of the content on an external storage unit that has a media ID that is peculiar to a storage unit, on a request input of a registration and a revision on the content.

Neither Kuroda nor Higashiura teach, disclose, or suggest "executing registration and revision processing of the content on an external storage unit that has a media ID that is peculiar to a storage unit, on a request input of a registration and a revision on the content," as discussed above with respect to claim 1. Claim 16 is thus also submitted to be allowable, for at least those reasons discussed above with respect to claim 1. Withdrawal of the rejection of claim 16 is earnestly solicited.

Claims 4 and 13:

Claims 4 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kuroda and Higashiura in view of U.S. Patent Publication No. 2002/0169973 to Kim et al. (hereinafter "Kim"), and further in view of U.S. Patent No. 6,249,866 to Brundrett et al. (hereinafter "Brundrett"). The rejection is traversed to the extent it might apply to the claims as amended. Reconsideration is earnestly solicited.

Claim 4 depends from claim 1 and adds additional distinguishing elements. Neither Kuroda nor Higashiura teach, disclose, or suggest a management device that "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as discussed above with respect to claim 1. Neither Kim nor Brundrett do

either, and thus cannot make up for the deficiencies of either Kuroda or Higashiura with respect to claim 4. Claim 4 is thus also submitted to be allowable. Withdrawal of the rejection of claim 4 is earnestly solicited.

Claim 13:

Claim 13 depends from claim 8 and adds additional distinguishing elements. Neither Kuroda nor Higashiura teach, disclose, or suggest a management device that "registers and revises the content on the portable medium and stores a processing history of said registration processing or a revision processing and the media ID for the content in relation to each other into said storage unit," as discussed above with respect to claim 1. Neither Kim nor Brundrett do either, and thus cannot make up for the deficiencies of either Kuroda or Higashiura with respect to claim 13. Claim 13 is thus also submitted to be allowable. Withdrawal of the rejection of claim 13 is earnestly solicited

Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-16 are allowable over the cited references. Allowance of all claims 1-16 and of this entire application is therefore respectfully requested.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

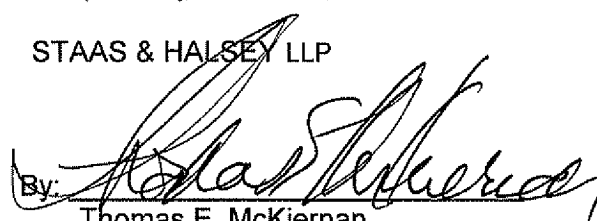
Respectfully submitted,

STAAS & HALSEY LLP

Date:

14 MAR 07

By:



Thomas E. McKiernan
Registration No. 37,889

1201 New York Avenue, NW, 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501